

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

**JOINT MOTION REQUESTING AN EXTENSION TO
SUBMIT PROPOSED BUDGET AND AGREEMENT**

COME NOW jointly Plaintiff, United States of America, and Defendants, Commonwealth of Puerto Rico, et al., and respectfully request an extension of time, until July 1, 2013, to submit a final reform agreement together with a proposed budget for implementation of the same. This extension is necessary to complete complex negotiations on comprehensive remedial measures that ensure the sustainable reform of the Puerto Rico Police Department (“PRPD”), address concerns raised by *amici* at the April 11, 2013 hearing, and resolve all claims brought by the United States in the instant action.

On December 27, 2012, this Court granted the Parties’ joint request to stay proceedings “until at least April 15, 2013” to provide the Commonwealth’s incoming administration an opportunity to negotiate and finalize a proposed settlement agreement. Dkt. No. 5. On February 6, 2013, this Court also ordered the Parties to submit a joint proposed budget for implementation of the proposed agreement by March 15, 2013. Dkt. No. 15. Since then, the Parties have been working consistently and collaboratively to finalize both the proposed budget and the agreement itself. Counsel and experts for the Parties met for extended sessions on February 27 and 28, 2013. The Parties then met on March 19 and 20, 2013, and again the week

of April 8, 2013. Since that time, the Parties have continued their work by exchanging draft language and budget proposals and conducting further negotiations over the telephone. The current deadline for the agreement and budget proposal is set for May 31, 2013. Dkt. No. 45. Despite the Parties' good faith efforts to resolve all outstanding issues, the completion of the agreement requires some further negotiations.

The Parties remain committed to sustainable reform of PRPD and to a collaborative resolution of all claims raised by the United States. The Parties have exercised considerable care and diligence to craft an appropriate, long-term remedial plan that builds on PRPD's current reform efforts, strengthens PRPD's crime-fighting initiatives, and increases the public's confidence in PRPD. At present, the Parties have nearly finalized the proposed agreement and budget. To complete these complex negotiations, reach final agreement on all outstanding issues, and prepare for the judicial filing and public release of the agreement, the Parties request an extension, until July 1, 2013.

WHEREFORE, the Parties respectfully request that this Court grant an extension until July 1, 2013, to allow the Parties to complete negotiations and file the final agreement and budget proposal for the Court's approval.

Respectfully submitted, this 28th of May, 2013,

FOR PLAINTIFF UNITED STATES:

THOMAS E. PEREZ
Assistant Attorney General

ROY L. AUSTIN, JR.
Deputy Assistant Attorney General
Civil Rights Division

FOR COMMONWEALTH DEFENDANTS:

LUIS SÁNCHEZ BETANCES
Secretary of Justice

MARTA ELISA GONZALEZ YGLESIAS
Deputy Secretary of Justice
For Litigation

JONATHAN M. SMITH
Chief

S/ LUIS E. SAUCEDO
LUIS E. SAUCEDO (G01613)
Acting Deputy Chief
SAMANTHA K. TREPEL
SERGIO PEREZ
Trial Attorneys
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Tel: (202) 598-0482
Fax: (202) 514-4883
luis.e.saucedo@usdoj.gov

Attorneys for Plaintiff

S/ CARLOS A. DEL VALLE CRUZ
CARLOS A. DEL VALLE CRUZ
USDC-PR # 130604
cdelvalle@justicia.pr.gov

S/ GERARDO DE JESUS ANNONI
GERARDO DE JESUS ANNONI
USDC-PR # 212209
gdejesus@justicia.pr.gov
Legal Counsel
P.R. Department of Justice
P.O. Box 9020192
San Juan, PR 00902-0192
Tel: (787) 721-7700, ext. 2105
Fax: (787) 722-4440

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on this 28th day of May 2013, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

s/Luis E. Saucedo

LUIS E. SAUCEDO

Acting Deputy Chief

U.S. Department of Justice

Civil Rights Division

Special Litigation Section

950 Pennsylvania Avenue, NW

Washington, DC 20530

Tel: (202) 598-0482

Fax: (202) 514-4883

Email: luis.e.saucedo@usdoj.gov

Attorney for Plaintiff